

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION**

<b>VICTORIA HILL ROSS,</b>	)
	)
<b>Plaintiff,</b>	)
	)
<b>VS.</b>	)
	No. _____
	)
<b>WAL-MART STORES EAST, LP</b>	)
<b>(d/b/a as Wal-Mart Supercenter Store</b>	)
<b>#4435),</b>	)
	)
<b>Defendant.</b>	)

**CORPORATE DISCLOSURE STATEMENT**

I, the undersigned counsel of record for defendant, certify to the best of my knowledge and belief that Wal-Mart Stores East, LP (d/b/a as Wal-Mart Supercenter Store #4435) has no corporate interest to be certified under Fed. R. Civ. P. Rule 7.1.

Wal-Mart Stores, Inc., is a Delaware corporation. Wal-Mart Stores East, LP, is a Delaware limited partnership (see footnote one).<sup>1</sup> WSE Management, LLC, a Delaware limited liability company, is the general partner, and WSE Investment, LLC, a Delaware limited liability company, is the limited partner. The sole member of WSE Management, LLC, and WSE Investment, LLC, is Wal-Mart Stores East, LLC, fka Wal-Mart Stores East, Inc.,<sup>2</sup> an Arkansas limited liability company. Wal-Mart Stores East, Inc., was converted to an Arkansas limited liability company on January 25, 2011. The principal place of business for all entities mentioned is 702 SW 8th Street, Bentonville, Arkansas.

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<sup>1</sup> Wal-Mart Stores East, LP, is the entity that operated the store on the date of this accident. It was sued as Wal-Mart Stores East, LP (d/b/a as Wal-Mart Supercenter Store #4435). Defendant may be referred to as "Wal-Mart" in this document. It is expected that Wal-Mart Stores East, LP, will be substituted as the proper defendant in this matter.

<sup>2</sup> Wal-Mart Stores East, Inc.'s parent company is Wal-Mart Stores, Inc., a Delaware corporation.

s/ G. Andrew Rowlett  
G. Andrew Rowlett, No. 16277  
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Attorney for defendant

#### **CERTIFICATE OF SERVICE**

I certify that a copy of the foregoing was electronically filed with the Court and was served by U.S. Mail, postage prepaid, upon:

Charles G. Blackard, III, Esq.  
219 Third Avenue North  
Franklin, TN 37064  
[cgb3@gmail.com](mailto:cgb3@gmail.com)

on this the 12<sup>th</sup> day of July, 2019

s/ G. Andrew Rowlett